

UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re)	
)	
LB 745 LLC)	Case No. 08-13555
)	
Debtor)	Chapter 11
)	
)	

NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY

PLEASE TAKE NOTICE, that, upon the attached exhibits and all papers filed in this case, Case No: 08-13555-lmp, Yuri Belik and Irene Belik (“Movants”), through their attorney, Sacks & Sacks, LLP, will move before the Honorable James J. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court, 1 Bowling Green, New York, NY 10004, on **September 18, 2013, at 10:00 a.m.**, or as soon thereafter as counsel may be heard, for entry of an order, pursuant to Federal Rules of Bankruptcy Procedure 4001(a) and 9014, granting Movants’ motion for relief from the automatic stay

PLEASE TAKE FURTHER NOTICE that written objections to the Motion must be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 by no later than **4:00 p.m. on September 11, 2013** (with a courtesy copy delivered to the Chambers of Honorable James J. Peck) and must be served upon (a) Sacks & Sacks, LLP, counsel for Movants, 150 Broadway, 4th Floor, New York, New York 10038, and (b) Fabiani, Cohen & Hall, LLP, Attorneys for Defendants in the civil action, LB 745 LLC and Henegan Construction Co., Inc., 570 Lexington Avenue, 4th Floor, New York, New York 10022, and (c) Ahmuty Demers & McManus, Attorney for Third-Party Defendants in the civil action, Forest Electric Corp., 200 I.U. Willets Road,

Albertson, New York, 11507, and (d) JDM Industries, Inc., a Third-Party defendant in the civil action, 445 Broadhollow Road, Suite 230, Melville, New York 11747, and (e) Harrigan Contracting Inc., a Defendant in the civil action, 82 Gavin Street, Yonkers, New York 10701. Any objections must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection to the Motion. Objecting parties need not attend the Hearing for the Bankruptcy Court to consider their objections.


PLEASE TAKE FURTHER NOTICE that replies to objections, if any, must be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 by no later than **4:00 p.m. on September 25, 2013** (with a courtesy copy delivered to the Chambers of the Honorable James J. Peck).

PLEASE TAKE FURTHER NOTICE that a proposed order form of order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that this motion may be decided without oral argument pursuant to Federal Rules of Civil Procedure 78.

PLEASE TAKE FURTHER NOTICE that any opposition to this motion is due within the time prescribed by Local Civil Rule 7.1.

Dated New York, New York
August 21, 2013



David Mayer, Esq.
Sacks & Sacks, LLP
Attorneys for Movants

Copies of the foregoing mailed on August 21, 2013 to:

FABIANI, COHEN & HALL, LLP
Attorneys for Defendants
LB 745 LLC and Henegan Construction Co., Inc.

570 Lexington Avenue, 4th Floor
New York, New York 10022
(212) 644-4420

AHMUTY DEMERS & McMANUS

Attorneys for Third-Party Defendant

Forest Electric Corp.

200 I.U. Willets Road

Albertson, New York 11507

(516) 294-5433

JDM INDUSTRIES, INC.

445 Broadhollow Road, Suite 230

Melville, New York 11747

HARRIGAN CONTRACTING INC.

82 Gavin Street

Yonkers, New York 10701